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*Attorneys for Plaintiff,
Bionpharma, Inc.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BIONPHARMA INC.,

Plaintiff,

v.

CORERX, INC.,

Defendant.

Case No. 1:21-cv-10656-JGK

NOTICE OF MOTION TO SEAL

PLEASE TAKE NOTICE that the above-named Plaintiff, Bionpharma, Inc. (“Bionpharma” or “Plaintiff”), by and through its attorneys, Holland & Knight LLP, moves to file (i) the Declaration of Todd Daviau and Exhibits A and B thereto, and (ii) Exhibit 1 to the Declaration of Charles Weiss in Support of Plaintiff Bionpharma’s (i) Motion to Dismiss the Counterclaims, or in the Alternative for Summary Judgment, and (ii) Motion for Summary Judgment on Count II of the Complaint under seal.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Plaintiff relies on the accompanying Memorandum of Law in Support of its Motion to Seal. A proposed Order granting the relief requested is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that Plaintiff will lodge unredacted copies of the aforementioned documents with the Court and will file redacted copies with this Motion.

DATED: April 29, 2022

HOLLAND & KNIGHT LLP

By: /s/ Charles A. Weiss
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[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO SEAL

Upon the motion of Plaintiff, Bionpharma Inc., for an order permitting the filing of (i) the Declaration of Todd Daviau and Exhibits A and B thereto, and (ii) Exhibit 1 to the Declaration of Charles Weiss in Support of Plaintiff Bionpharma's Motion to Dismiss under seal, and upon review of the Memorandum of Law in support thereof, it is hereby:

ORDERED that Plaintiff's Motion to Seal is **GRANTED**, and it is

FURTHER ORDERED that the (i) the Declaration of Todd Daviau and Exhibits A and B thereto, and (ii) Exhibit 1 to the Declaration of Charles Weiss in Support of Plaintiff Bionpharma's (i) Motion to Dismiss the Counterclaims, or in the Alternative for Summary Judgment, and (ii) Motion for Summary Judgment on Count II of the Complaint shall remain redacted in the public record of this case.

DATED: August 16, 2022

/s/ John G. Koeltl
UNITED STATES DISTRICT JUDGE